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*NOT ADMITTED TO THE NEW YORK BAR

September 22, 2021

Via ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Neil Cole*, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. In connection with Mr. Cole's Motion to Compel the Government to Immunize Certain Witnesses, and pursuant to the Protective Order filed in this case (ECF No. 15 ¶ 9), we respectfully request permission to (i) file Exhibits A–C under seal; and (ii) redact portions of Exhibit D to the motion.

We are providing to Your Honor's chambers and to the government unredacted copies of the filing.

Respectfully submitted,

/s/ Richard C. Tarlowe
Richard C. Tarlowe